

FILED BY *ag* D.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

AZ
2005 MAY 10 AM 10:05

ROBERT B. DI TROLIO
CLERK, U.S. DIST. CT.
W.D. OF TENNESSEE
JULIA J. McMILLIAN,

Plaintiff,

VS

NO. 04-2102 Ma-An

RONNIE L. EVATT and
CENTRAL INDUSTRIAL
ELECTRIC COMPANY, INC.

MOTION GRANTED

Jon Phipps McCalla
JON PHIPPS McCALLA
U.S. DISTRICT JUDGE
May 12, 2005
DATE

Defendants.

MOTION TO EXTEND DEADLINES

Comes the Plaintiff, by her counsel of record, and submits this Motion requesting that the Court extend certain deadlines previously set by the Scheduling Order entered by the Court. The Plaintiff and Defendants have agreed to mediate this case. In support of said Motion, the Plaintiff would show as follows:

1. This case is set for trial on September 26, 2005.
2. The Pretrial Conference is set on September 20, 2005.
3. The Joint Pretrial Order is due September 13, 2005.
4. The Plaintiff requests that the discovery deadlines be extended as follows:
 - a. Requests for Production, Interrogatories, Request for Admissions:
May 15, 2005

- b. Expert Disclosure
 - (i) Plaintiff's expert: June 13, 2005
 - (ii) Defendant's experts: July 18, 2005
 - (iii) Supplementation under Rule 26(e): July 31, 2005
- c. Deposition of Fact Witnesses: June 27, 2005
- d. Expert: August 15, 2005
- e. Filing Disposition Motions: September 1, 2005
- d. Final lists of witnesses:
 - (i) From Plaintiff: September 1, 2005
 - (ii) From Defendant: September 7, 2005

5. Parties shall have five (5) days after service of final lists of witnesses and exhibits to file objections under Rule 26(a)(3).

6. The trial is expected to last three (3) days.

7. While Defendants are not filing this motion jointly, they are not opposed.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully ask that the Court extend the discovery deadline as follows:

- 1. This case is set for trial on September 26, 2005.
- 2. The Pretrial Conference is set on September 20, 2005.
- 3. The Joint Pretrial Order is due September 13, 2005.
- 4. The discovery deadlines will be extended as follows:
 - a. Requests for Production, Interrogatories, Request for Admissions: May 15, 2005.

- b. Expert Disclosure
 - (i) Plaintiff's expert: June 13, 2005
 - (ii) Defendant's experts: July 18, 2005
 - (iii) Supplementation under Rule 26(e): July 31, 2005
- c. Deposition of Fact Witnesses: June 27, 2005
- d. Expert: August 15, 2005
- e. Filing Disposition Motions: September 1, 2005
- d. Final lists of witnesses:
 - (i) From Plaintiff: September 1, 2005
 - (ii) From Defendant: September 7, 2005

5. Parties shall have five (5) days after service of final lists of witnesses and exhibits to file objections under Rule 26(a)(3).

Respectfully submitted:




Danese K. Banks, Esq. (BPR #17705)
THE COCHRAN FIRM – MEMPHIS
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(901) 523-1222

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this pleading or document was served upon counsel for the parties or the parties individually by mailing postage prepaid or by delivery to the person or office of such counsel:

Richard Sorin, Esq.
81 Monroe Avenue - Sixth Floor
Memphis, Tennessee 38103

this the 10th day of May, 2005.



Danese K. Banks, Esq.



Notice of Distribution

This notice confirms a copy of the document docketed as number 20 in case 2:04-CV-02102 was distributed by fax, mail, or direct printing on May 18, 2005 to the parties listed.

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Honorable Jon McCalla
US DISTRICT COURT